

PARSONS BEHLE & LATIMER

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Attorneys for

Stirling Mortimer Global Property Fund PCC Limited

UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEVADA

In re:)	Case No.: 13-13969-BTB
)	
Regal Property Holdings, Inc.)	Chapter 11
)	
Richard N. Roberts and Jane S. Roberts,)	Joint Administration With:
)	Case No.: 13-13968-BTB
)	
Debtors.)	Hearing: January 23, 2014, at 2:00 p.m.,
)	and January 24, 2014, at 9:00 a.m.

**STIPULATION CONTINUING VOTING, OBJECTION, AND
REPLY DEADLINES WITH RESPECT TO THE DEBTORS' PLAN**

Stirling Mortimer Global Property Fund PCC Limited (“**Stirling**”), by and through its counsel of record, Parsons Behle & Latimer, and the above-captioned debtors and debtors-in-possession (the “**Debtors**”), by and through their counsel of record, The Schwartz Law Firm, Inc. and Lionel Sawyer & Collins, hereby stipulate and agree as follows:

WHEREAS, on July 19, 2013, the Debtors filed their: (i) Disclosure Statement for their Chapter 11 Plan of Liquidation (Docket No. 143); and (ii) motion for approval of certain procedures related to the Debtors’ Plan and Disclosure Statement (the “**Procedures Motion**”) (Docket No. 150);

WHEREAS, on October 28, 2014, the Court entered the Order (i) approving the disclosure statement; (ii) approving the form of ballots and proposed solicitation and tabulation procedures for

the Plan; (iii) fixing December 13, 2013, as the voting deadline (the “**Voting Deadline**”) with respect to the Plan, (iv) prescribing the form and manner of notice thereof; (v) fixing December 13, 2013, as the last day for filing objections to the Plan pursuant to Bankruptcy Rules 3020(b) and 9006(c)(1) (the “**Confirmation Objection Deadline**”); (vi) scheduling a hearing to consider confirmation of the Plan (the “**Confirmation Hearing**”) on January 23, 2014, at 2:00 p.m., and January 24, 2014, at 9:00 a.m., (vii) approving The Schwartz Law Firm, Inc. as the Debtors’ solicitation and tabulation agent; and; (viii) fixing January 9, 2014, as the deadline for filing any replies to any objections to the Plan (the “**Reply Deadline**”).

WHEREAS, the parties are currently working together to resolve the objections to the Plan and desire to continue the Voting Deadline, the Confirmation Objection Deadline, and the Reply Deadline as follows:

<u>Deadline</u>	<u>New Date</u>
Voting Deadline	December 27, 2013
Confirmation Objection Deadline	December 27, 2013
Reply Deadline	January 16, 2014

NOW THEREFORE, Stirling and the Debtors hereby stipulate and agree to the following, and by the Order attached to this Stipulation as **Exhibit A**, seek Court approval of the same:

IT IS HEREBY STIPULATED AND AGREED that the Voting Deadline and the Confirmation Objection Deadline are extended to December 27, 2013, and the Reply Deadline is extended to January 16, 2014

1
2 Date: December 12, 2013

3 /s/ Samuel A. Schwartz, Esq.
4 Samuel A. Schwartz, Esq.
5 Nevada Bar No. 10985
6 Bryan A. Lindsey, Esq.
7 Nevada Bar No. 10662
8 The Schwartz Law Firm, Inc.
9 6623 Las Vegas Blvd. South, Suite 300
10 Las Vegas, Nevada 89119
11 Attorneys for the Debtors

12 Date: December 12, 2013

13 /s/ J. Thomas Beckett, Esq.
14 J. Thomas Beckett, Esq.
15 (Admitted Pro Hac Vice)
16 Parsons Behle & Latimer
17 201 South Main Street, Suite 1800
18 Salt Lake City, Utah 84111
19 Attorneys for Stirling Mortimer
20 Global Property Fund PCC Limited

Date: December 12, 2013

/s/ Ryan A. Anderson, Esq.
Ryan A. Andersen, Esq.
Nevada Bar No. 12321
Lionel Sawyer & Collins
300 South 4th Street, Suite 1700
Las Vegas, Nevada 89101
Special Litigation Counsel for the Debtors

Submitted by:

Parsons Behle & Latimer

By /s/ J. Thomas Beckett, Esq.
Attorneys for Stirling Mortimer
Global Property Fund PCC Limited

EXHIBIT A

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Attorneys for
Stirling Mortimer Global Property Fund PCC Limited

UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEVADA

In re:)	Case No.: 13-13969-BTB
)	
Regal Property Holdings, Inc.)	Chapter 11
)	
Richard N. Roberts and Jane S. Roberts,)	Joint Administration With:
)	Case No.: 13-13968-BTB
)	
Debtors.)	Hearing: January 23, 2014, at 2:00 p.m.,
_____)	and January 24, 2014, at 9:00 a.m.

**ORDER APPROVING STIPULATION CONTINUING VOTING, OBJECTION,
AND REPLY DEADLINES WITH RESPECT TO THE DEBTORS' PLAN**

Stirling Mortimer Global Property Fund PCC Limited (“**Stirling**”), by and through its counsel of record, Parsons Behle & Latimer, and the above-captioned debtors and debtors-in-possession (the “**Debtors**”), by and through their counsel of record, The Schwartz Law Firm, Inc. and Lionel Sawyer & Collines, having stipulated and agreed as provided for in that certain Stipulation (the

1 “**Stipulation**”) Continuing Voting, Objection, and Reply Deadlines with Respect to the Debtors’ Plan
2 in the above-captioned bankruptcy case; and the Court having considered the Stipulation and finds
3 that the relief requested in the Stipulation is appropriate and sufficient cause exists to grant the relief;
4 and for good cause appearing, it is hereby—
5

6
7 ORDERED that the Stipulation is APPROVED; and it is further
8

9 ORDERED that the Voting and Objection Deadlines on the Debtors’ Plan will be extended to
10 December 27, 2013, and that the Reply Deadline will be extended to January 16, 2014.
11
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14 Submitted by:

15 Parsons Behle & Latimer
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17 By /s/ J. Thomas Beckett, esq.
18 Attorneys for Stirling Mortimer
19 Global Property Fund PCC Limited
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CERTIFICATE OF SERVICE

I hereby certify that I am an employee of the law firm of Parsons Behle & Latimer and that on the 12th day of December 2013, I filed a true and correct copy of the foregoing STIPULATION TO EXTEND VOTING, OBJECTION, AND REPLY DEADLINES WITH RESPECT TO THE DEBTORS' PLAN with the Clerk of the Court through the Court's CM/ECF system, which sent electronic notification to all registered users as follows:

**BMW FINANCIAL SERVICES,
NA, LLC FKA FINANCIAL
SERVICES VEHICLE TRUST**

POLI & BALL PLC
3311 S. RAINBOW BLVD., STE 215
LAS VEGAS, NV 89146
702-380-8095
bkecf@poliball.com
Added: 08/13/2013
(Creditor)

represented
by

JAMES B. BALL

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(702) 380-8095
(702) 380-3001 (fax)
bkecf@poliball.com
Assigned: 08/13/13

**DEUTSCHE BANK NATIONAL
TRUST COMPANY**

Added: 06/06/2013
(Creditor)

represented
by

GREGORY L. WILDE

208 S. JONES BLVD.
LAS VEGAS, NV 89107
(702) 258-8200
(702) 258-8787 (fax)
nvbk@tblaw.com
Assigned: 06/06/13

IRS

POB 21126
PHILADELPHIA, PA 19114
Added: 09/03/2013
(Creditor)

represented
by

ROLLIN G. THORLEY

110 CITY PARKWAY, STE 301
LAS VEGAS, NV 89106
(702) 868-5167
(702) 868-5440 (fax)
rollin.g.thorley@irs.counsel.treas.gov
Assigned: 09/03/13

LIONEL SAWYER & COLLINS

Added: 06/18/2013
(Special Counsel)

**REGAL PROPERTY HOLDINGS,
INC.**

4750 N. JENSEN STREET
LAS VEGAS, NV 89129-1606
Tax ID / EIN: 75-3236126
Added: 05/06/2013
(Debtor)

represented
by

BRYAN A. LINDSEY
THE SCHWARTZ LAW FIRM
6623 LAS VEGAS BLVD. SO., STE 300
LAS VEGAS, NV 89119
bryan@schwartzlawyers.com
Assigned: 05/07/13

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(702) 385-2741 (fax)
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Assigned: 05/08/13
TERMINATED: 05/21/13

JANE S ROBERTS
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SSN / ITIN: xxx-xx-1004
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(Interested Party)

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JANE S. ROBERTS
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Added: 05/21/2013
(Jnt Admin Debtor)

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RICHARD N ROBERTS
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SSN / ITIN: xxx-xx-8517
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TERMINATED: 05/21/2013
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(Jnt Admin Debtor)

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**STIRLING MORTIMER GLOBAL
PROPERTY FUND PCC LIMITED**
PO BOX 225
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ST. PETER PORT GUERNSEY GY1
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Added: 05/10/2013
(Interested Party)

represented
by

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**SYNERGY SOTHEBY'S
INTERNATIONAL REALTY**

Added: 10/21/2013
(Realtor)

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Added: 05/06/2013
(U.S. Trustee)


Brian M. Rothschild
Employee of Parsons Behle & Latimer